

Norma Chavez

From: Charles Hunter <chunter@hayeshunterlaw.com>
Sent: Wednesday, December 20, 2023 2:06 PM
To: Norma Chavez; Ana Castro
Cc: george@twomeymay.com; c.ross.travis@usdoj.gov; kbartley@ws-law.com; linda@ws-law.com; Brendon Singh
Subject: Bankruptcy Case No. 23-33463

CAUTION - EXTERNAL:

Dear Judge Rodriguez,

I write to follow up on our conversation in the hearing today in the adversary proceeding regarding my ability to represent parties in these actions. You indicated that on the current record I can represent Ms. Han in the adversary proceeding. I apologize for not thinking then to ask if I can continue to represent the Debtors in the reorganization proceeding until substitute counsel is obtained. I am not asking for legal advice but for a statement of allowable practice in your court.

My concern is that Mr. Savvon has filed an emergency motion today for dismissal, and Mr. May informs me that his counsel will also file a motion today addressing the stay. Additionally, Ms. Han wants relief from the DIP account deadline and the exclusivity date. If I cannot respond to these motions or file interim motions, the Debtors will be unrepresented. I am concerned whether I can ethically withdraw leaving the client unrepresented, although I fully appreciate the effect of your order denying the application for employment.

I am asking for guidance and, essentially, permission to protect the Debtors while they seek new counsel.

Sincerely,

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Attorney

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